

RELATED CORRESPONDENCE

00725786  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

TEXAS UTILITIES ELECTRIC  
COMPANY, et al.

(Comanche Peak Steam Electric  
Station, Units 1 and 2)

Docket Nos.

OFFICE OF SECRETARY  
DOCKETS & SERVICE  
and 50-BRANCH

(Application for an  
Operating License)

CASE'S THIRD SET OF INTERROGATORIES  
TO APPLICANTS AND REQUESTS TO PRODUCE

RE: CREDIBILITY

Pursuant to the Board's 12/18/84 MEMORANDUM (Reopening Discovery; Misleading Statement) (pages 9 and 10), CASE (Citizens Association for Sound Energy), Intervenor herein, files this, its Third Set of Interrogatories to Applicants and Requests to Produce Re: Credibility.

This is the third of several such requests which CASE intends to file under this Board Memorandum.

Please answer the following interrogatories and requests for documents in the manner set forth herewith:

1. Each interrogatory should be answered fully in writing, under oath or affirmation.
2. Each interrogatory or document response should include all pertinent information known to Applicants, their officers, directors, or employees, their agents, advisors, or counsel. Employees is to be construed in the broad sense of the word, including specifically, Brown and Root, Gibbs & Hill, Ebasco, Cygna, O. B. Cannon, any consultants, sub-contractors, and anyone else performing work or services on behalf of the Applicants or their agents or sub-contractors.

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3. The term "documents" shall be construed in the broad sense of the word and shall include any writings, drawings, graphs, charts, photographs, reports, studies, audits, slides, internal memoranda, informal notes, handwritten notes, tape recordings, procedures, specifications, calculations, analyses, and any other data compilations from which information can be obtained.
4. Each document provided should include a sworn statement of its authenticity.
5. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.
6. Identify the person providing each answer, response, or document.
7. These interrogatories and requests for documents shall be continuing in nature, pursuant to 10 CFR 2.740(e) and the past directives of the Licensing Board. Because of the time restrictions under which we are presently working, we request that supplementation be made on an expedited basis.
8. For each item supplied in response to a request for documents, identify it by the specific question number to which it is in response. If the item is excerpted from a document, identify it also by the name of the document. Please also provide the copies in the correct order (rather than in reverse order).

CASE'S INTERROGATORIES TO APPLICANTS AND REQUESTS TO PRODUCE

1. Please provide a copy of each and every audit, report of audit findings, memoranda, and other compilations of information (from any and all sources) for the document control program which have ever been done regarding the document control program, document control center, or other document control-related activities at Comanche Peak.
2. Please provide a copy of all responses and follow-ups to such documents for inspection and copying.
3. Please provide for inspection and copying all notes, memoranda, and other compilations of information documenting interviews with audit, supervisory, or managerial personnel concerning the firings of Ms. Dobie Hatley, Ms. Billie Orr, and Ms. Meddie Gregory. (This information should include all information leading up each firing, and subsequent to each firing.)
4. Please provide for inspection and copying all notes, memoranda, and other compilations of information documenting interviews with Phyllis Wells (head of audit team at the time of Ms. Hatley's termination) and Joan Swain (assistant head of audit team at the time of Ms. Hatley's termination) with Mr. Frank Strand regarding Ms. Hatley's work as supervisor of the satellite.
5. Please provide for inspection and copying all notes, memoranda, and other compilations of information documenting interviews with Edie Hudson, Jim Tate, and Janice Day (workers in the 306 satellite section at the time of Ms. Hatley's termination) with Frank Strand regarding Ms. Hatley's work as supervisor of the satellite.
6. Please provide for inspection and copying all notes, memoranda and other compilations of information documenting interviews with Kay Norman and Pam Parker (both auditors with the audit team at the time of Ms. Hatley's termination) with Mr. Frank Strand regarding Ms. Hatley's work as supervisor of the satellite.
7. Please provide for inspection and copying all daily reports provided to Mr. Frank Strand for the months of January and February, 1984 which log phone requests from satellite 306 into the phone bank regarding design changes. (Also provide this information for all other satellites for the same time period.)
8. Please provide a copy of the memorandum from Frank Strand sometime during the end of January, 1984 requesting an audit of the design change log for satellite 306, as well as all follow-ups and responses to that request.
9. Please provide a copy of the complete <sup>package</sup> audit (including all associated memoranda and other compilations of information) which resulted from this request (see Interrogatory #8 above.)

10. Please provide a complete copy of all audits conducted during January, 1984 on any phase of document control, including, but not limited to the satellites. (Include all associated memoranda, responses, follow-ups, and other compilations of information with the audit itself.)
11. Please provide a copy of all responses and follow-ups, including memoranda and other compilations of information, etc. for the package audit provided in response to Interrogatory #8 on the preceding page. (Include with your response, copies of each and every daily update on the ongoing audit which was provided to Mr. Frank Strand.)
12. Please provide a copy of all notes, memoranda, reports, etc. concerning the meeting between Mr. Frank Strand and Mr. Boyce Grier concerning Ms. Hatley's termination. (This refers to compilations of information by Mr. Strand.)
13. Please provide a copy of each and every follow-up investigation by Mr. Grier or any of TUGCO's, TU's, or TUSI's personnel concerning Ms. Hatley's termination. Include with your response all memoranda, notes, and other compilations of information along with any formal reports.
14. Please provide complete copies of each and every tape recording, transcript of each and every tape recording, and notes of each and every tape recording of the meeting(s) between interviews with employees in satellite 306 and Mr. Frank Strand, other Brown & Root supervisors or managers, TU/TUSI/TUGCO supervisory personnel and/or attorneys concerning the work of the satellite and/or Ms. Hatley's work and/or termination.
15. Please provide a copy of all stop-work orders issued for any phase of work at Comanche Peak from September, 1983 to date.
16. Please provide for inspection and copying all associated documentation (including, but not limited to, memoranda, notes, and other compilations of information, responses, and follow-ups) to the information provided in response to Interrogatory #15 above.
17. Please provide for inspection and copying all reports, memoranda, audits, and all associated compilations of information regarding documentation control center computer shutdowns from September, 1983 through January, 1984. (Include with your response copies of all follow-ups, responses, etc.)
18. Please provide a complete copy of NCR M-83-3049, including all revisions, for inspection and copying. (Please include all associated documentation.)
19. Please provide a complete copy of TCP-84 audit, including all associated responses, follow-ups, memoranda and associated documentation for inspection and copying.
20. Please provide a complete copy of NCR M-83-01629 (dated 6/14/83), including all revisions and associated documentation (including but not limited to all revisions, memoranda, 50,55(e) reports, etc.) for inspection and copying.

21. Please provide for inspection and copying a complete copy of NCR M-84-00082 dated 1/10/84, including all revisions and associated documentation (notes, memoranda, reports, 50.55 (e) reports, etc.).
22. Please provide for inspection and copying all follow-ups, responses, reports, memoranda, etc. concerning QAT #0003.
23. Please provide for inspection and copying all responses, correspondence, memoranda, notes and attachments to same provided to Mr. Eisenhower by TUGCO/TUSI/TU in response to BN 84-085.
24. Please provide for inspection and copying all investigations, reports, notes, memoranda, and associated documentation developed in the course of Mr. S. Hartman's investigation of Ms. Hatley's version of how she obtained a copy of a list of documentation furnished in advance to Cynga personnel to Hayward Hutchinson.
25. Please provide for inspection and copying a complete copy of SDAR CP-84-01 including all revisions and associated documentation (notes, memoranda, reports, 50.55 (e) reports, etc.).
26. Please provide for inspection and copying each and every memorandum, notes, compilation of information and associated reports and documentation developed by Bob Spangler (or by his personnel) and documentation specialists working from John Merriam's staff in response to Ms. Hatley's allegations as stated in BN-84-035.
27. Please provide for inspection and copying a complete copy of procedure DCP-3 (all revisions and associated documentation).
28. Please provide for inspection and copying all procedures (and all revisions to each and every procedure plus all associated documentation for each revision to each procedure) relating to the document control procedures for the paper-flow groups for the building task forces, beginning in December, 1983 through the present.
29. Please provide a complete copy of the memorandum #35-1195, dated 2/7/84 to Ray Yockey from H.A. Hutchinson/F.M. Strand re "Termination of Dobie Hatley (Badge B-993)". (This is a Brown & Root memo.)
30. Please provide a complete copy of the Memorandum for Record dated 2/7/84 the subject of which is "Termination of Dora D. (Dobie) Hatley" signed by Ray Yockey, Manager, Personnel Services. (Those present were: D.C. Frankum, Ray Yockey, H. H. Hutchinson, and Dobie Hatley.)
31. Please provide a complete copy of TUGCO Office Memorandum CQA-001, to B. C. Scott from A. Vega, TUGCO Site QA Manager, dated June 13, 1984, on "Questions Arising from Investigations into D. Hatley Allegations."
32. Please provide a complete copy of TUGCO Office Memorandum QIQ-766 dated June 14, 1984 to D. N. Chapman from R.G. Spangler on "Board Notification 84-085".



33. Please provide a complete copy of TUGCO Office Memorandum QAI #0003 to "Distribution" re "Request for Assistance in Resolving Quality Assurance Allegations". (This refers to an investigation requested by Boyce Grier on 2/9/84.)
34. Please provide a complete copy of the TUGCO Office Memorandum dated February 24, 1984 to A. Vega from Boyce H. Grier re "Allegations of Dobie Hatley".
35. Please provide a complete copy of the "attachment" noted at the close of the two-page memorandum provided in response to Interrogatory #34 above. ("Attachment" appears right above cc: D.N. Chapman, R. G. Tolson.)
36. Please provide a complete copy of the TUGCO Office Memorandum dated May 22, 1984 to Michael D. Spence from D. N. Chapman re "Dobie Hatley Allegations".
37. Please provide a complete copy of the TUGCO Office Memorandum dated April 9, 1984 to Mr. David Chapman from David L. Andrews, Director of Corporate Security re "Response - Request for Investigative Assistance Regarding Allegations by Ms. Dobie Hatley".
38. Please provide complete copies of the books which were the personal property of Ms. Dobie Hatley, which Applicant or its attorneys presented to her during one of her depositions (sometime during the summer of 1984), but which Applicant or its attorneys have not yet returned to her.

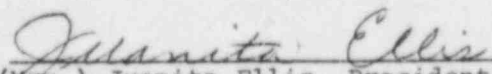
Also, return the original books to Ms. Hatley.
39. If there are other documents (under the broad definition on page 2, item 3, of this pleading) which pertain or are relevant to questions 1 through 38 preceding, supply them also.
40. Provide copies of the time cards or sheets (whatever record is kept on the time specific individuals worked) for all individuals who worked in the satellites at any time on 10/24/83 or in the morning on 10/25/83 up till the time Cygna came to review the information they had requested in their list .
41. Specifically what information was supplied to Cygna as a result of their supplying the list or which was listed by Cygna? Supply copies of all such information.
42. At the time Cygna came on site in October 1983, were the document control center and the satellites the only ones who had control stamps showing that documents were controlled?

If the answer is no, provide complete details as to specifically who (specific name, title, organization) else had control stamps, how such control stamps were being used, any audits or investigations, etc., which were made of such use, and all documents (as defined on page 2, item 3, of this pleading) regarding such use, investigation, etc. Give complete details, including whether or not deficiency paper was generated regarding such unauthorized use.

43. Is it Applicants' intention to put design change information for the site drawings on the computer rather than being handled manually? If so, has this been done? If it is planned but has not been completed, what is the current status and when is it expected that it will be completed?
44. Is it Applicants' intention to put all design change information (for site drawings and vendor drawings as well) on the computer rather than its being handled manually? If so, has this been done? If it is planned but has not been completed, what is the current status and when is it expected that it will be completed?
45. Why was the decision made to put design changes into the computer rather than being handled by hand? Why switch from manual to computer? More specifically, was it because of problems in the manual system?
46. Who specifically (name, title, organization) inputs information into the computer regarding design changes? Indicate whether each such individual inputs such information directly by actually typing it in or if each such individual provides the information to be input to someone else who then types it in. Include the name, title, and organization of all individuals who type in information provided by someone else as well. Also indicate which of these individuals are with DCTG.
47. Are any of the individuals in the satellite system inputting information into the computer? If so, indicate in answer 46 which individuals are in the satellite system and exactly what their function is in the satellite system.
48. Provide documentation of the training regarding the use of computers each individual listed in answers 46 and 47 has had including the date of all such training, the specific types of training received, who taught each such individual and the qualifications of each such teacher to teach the use of the particular computer used at Comanche Peak (include the name, title, and organization of each such teacher).
49. Do any of the computers used in the satellite system capable of having information input into them? If so, give specific and complete details, including but not limited to: which satellites have this capability, who (specifically name, title, and organization) has access to such computers, the purpose of such use by each such satellite, etc. Include also whether or not each such computer has the capability for erasing information.
50. If the information following has not already been supplied in response to other questions asked in the preceding, provide it now: Provide all documents (in the broad sense, as set forth on page 1, item 3, of this pleading) which have to do with any discussions, investigations, meetings, or other efforts to ascertain what happened regarding the list supplied by Cygna, the state of the satellites and the satellite system (whether or not it was functioning correctly, whether or not there were problems, what such problems were, to investigate allegations, the audit referred to by Heyward Hutchison at Tr. 9657/17, the tape recordings (and any others) referred to by Heyward Hutchison at Tr. 9666/20-9668/5, etc.), any any other information which is relevant to any of the matters discussed in questions 1-50 of this pleading.

51. Provide copies of all procedures which relate to any of the questions 1-50 asked in the preceding. Provide the original and all revisions.
52. Who (name, title, organization) had access to input information into the computer at the time of the Cygna audit (10/24/83)? Who (name, title, organization) has access to input information into the computer at this time? Provide copies of all procedures which relate to this (original and all revisions).
53. Is access to the computer a controlled job? Supply documentation if the answer is yes.
54. Is Caroline Redding still the supervisor of the Computer Operations Group? If not, who has been and is currently the supervisor? If not, why did Ms. Redding quit or was she terminated? Supply documentation, such as termination slip, counseling report, and any other relevant documents. If Ms. Redding is no longer at the plant, supply her last known address and telephone number.
55. Provide the names, titles, and organizations of all individuals who were in the Design Change Tracking Group (DCTG) as of 10/24/83? At this time?
56. Was there ever an investigation done by the NRC Office of Investigation or any other NRC organization into the matter of prenotification of Cygna, potential problems with the satellites or the satellite system (other than the NRC Technical Review Team)? If the answer is yes, supply all documents (in the broad sense of the word, as defined on page 2, item 3, of this pleading) relevant to such investigation(s).
57. Who (names, titles, and organizations) knew about or has now found out about the secret audit performed by Brown & Root just prior to the firing 2/7/84 of Dobie Hatley regarding the satellites and/or the satellite system? Give complete specific details including when and how each such person found out about such audit.
58. CASE believes Applicants should supply answers to all the questions, and all the documents requested herein, as well as the depositions of Heyward Hutchison on 2/11/85 and Frank Strand on 2/12/85 in the Dobie Hatley DOL hearing, to the Licensing Board as a Board Notification of new and significant information. Will Applicants agree to do this?

Respectfully submitted,

  
(Mrs.) Juanita Ellis, President  
CASE (Citizens Association for Sound Energy)  
1426 S. Polk  
Dallas, Texas 75224  
214/946-9446



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	}}	
	}}	
TEXAS UTILITIES ELECTRIC	}}	Docket Nos. 50-445-1
COMPANY, <u>et al.</u>	}}	and 50-446-1
(Comanche Peak Steam Electric	}}	
Station, Units 1 and 2)	}}	

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of  
CASE's Third Set of Interrogatories to Applicants and Requests to Produce

Re: Credibility

have been sent to the names listed below this 25th day of February, 1985,  
by: Express Mail where indicated by \* and First Class Mail elsewhere.

- |   |  |
|---|--|
| * Administrative Judge Peter B. Bloch<br>U. S. Nuclear Regulatory Commission<br>4350 East/West Highway, 4th Floor<br>Bethesda, Maryland 20814         | * Nicholas S. Reynolds, Esq.<br>Bishop, Liberman, Cook, Purcell<br>& Reynolds<br>1200 - 17th St., N. W.<br>Washington, D.C. 20036  |
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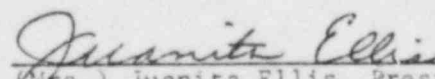
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